

override the subscriber's preferred carrier only if that carrier is unable to process the 911 call. This approach is the most effective way to enhance the ability of public safety officials to respond to wireless 911 calls and would not force the Commission to become mired in the details of service quality and engineering standards.

Pursuant to the Alliance's initial proposal, all 911 calls placed by analog cellular subscribers would be routed to the so-called "strongest signal." The wireless industry and the public safety community opposed this proposal because it would force all calls in a particular location to be sent to a single cell site, dramatically increasing the potential for call blockage and fast busy signals. In addition, strongest signal routing would inhibit the ability of PSAPs to call back subscribers because many calls would not be carried by the "home" provider, which possesses the subscriber information in its database. Similarly, during the additional four to eighteen second period required for the handset to register on a non-preferred system, the caller might panic, hang up, and redial. This would start the registration process anew with the same call setup delay. Finally, the wireless and public safety commenters opposed the Alliance's proposal because it would do nothing to ensure that a good quality voice channel is used. Under the Alliance's approach, the dialed 911 call would seek the strongest control channel, which does not necessarily coincide with a usable voice channel.

The Alliance's revised "adequate signal" proposal is an improvement over the initial approach because it would not require all cellular calls to be routed to the strongest signal. Rather, it establishes a call quality threshold and mandates that only those calls below the

² See Letter to the Honorable William Kennard, Chairman, FCC, from Jim Conran, Chairman, Ad Hoc Alliance for Public Access to 911, CC Docket No. 94-102 (Sept. 17, 1998).

threshold seek out the strongest signal.³ Nevertheless, this new method suffers from the same problems discussed above for all calls that fall below the threshold even if those calls could be adequately placed and maintained on the preferred carrier's system. By continuing to propose that all such calls be pushed to just one carrier's network, the industry's previous concerns about system congestion and call setup delays remain unabated. Moreover, the Alliance's revised proposal does not alleviate the adverse impact on PSAP call back capabilities to callers not on their preferred systems.

Although the Alliance may believe that the wireless industry has some unspoken, yet uncharitable, purpose for opposing the strongest signal proposals, nothing could be further from the truth. Like the Alliance, the wireless industry has been diligently pursuing methods to enhance the ability of its subscribers to obtain emergency services. AWS would be willing to route 911 calls both onto and off its system if the Alliance could demonstrate that its method would promote, rather than retard, call completion. All credible evidence leads AWS to conclude, however, that the Alliance's proposal, both in its original form and as revised, represents a significant threat to wireless customers' safety.

Because of these concerns, AWS supports the adoption of an automatic A/B selection system that would permit new analog handsets to access the non-preferred carrier if the preferred carrier's network is not available. This may permit a cellular customer who is located in a coverage "hole" to place a 911 call even if the carrier to which he or she is subscribed (or an authorized roaming partner) is unable to process the call. Unlike the arbitrary and inalterable

³ While AWS declines to comment on the Trott Report submitted by the Alliance, it submits that the Commission should not place itself in the position of setting or monitoring appropriate levels of call quality.

signal threshold the Alliance wants the Commission to set, this automatic A/B selection proposal would leave to each carrier the ability to make determinations about signal strength based on the characteristics of its individual infrastructure and handsets. Any bright line signal strength definition adopted by the Commission would necessarily be both under-inclusive and over-inclusive because it would ignore the vast differences between cellular systems, geographic locations, and customer equipment. Carriers are in a far better position to establish criteria for their own networks and to alter that criteria as needed to ensure the best 911 service for their subscribers.

Automatic A/B selection also is compatible with existing network registration and control procedures and could be implemented expeditiously with little or no network reconfiguration. More importantly, this approach would recognize the importance of the home carrier to call setup timing, call back, and other critical issues and would only divert the call if necessary to process the call attempt.

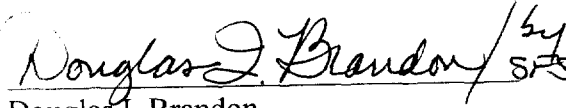
CONCLUSION

For the foregoing reasons, AWS urges the Commission to reject the Alliance's "adequate signal" proposal and instead to permit analog cellular carriers to implement an automatic A/B selection process.

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CERTIFICATE OF SERVICE

I, LeShawn Riley, hereby certify that on the 7th day of October, 1998, I caused copies of the foregoing "Additional Comments of AT&T Wireless Services, Inc." to be sent by hand delivery (*) or first class, postage pre-paid mail to the following:

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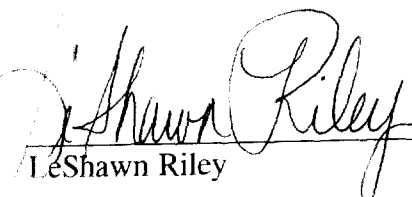
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